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September 11, 2024

VIA ECF

The Honorable Leonard P. Stark
U.S. Court of Appeals for the Federal Circuit
717 Madison Place, NW
Washington, D.C. 20439

**Re: Crystallex International Corporation v. Bolivarian Republic of Venezuela
(No. 17-mc-151-LPS)**

Dear Judge Stark:

We write on behalf of the ad hoc Board of Petróleos de Venezuela, S.A. (PDVSA), joined by the Bolivarian Republic of Venezuela (the “Republic”), in response to Your Honor’s order of September 10, 2024, directing the Sale Process Parties to “provide input as [] to whether they wish to participate in the briefing on the Motion for Injunction, and its timing.”

As noted by the Special Master in the Motion for Injunction, the Republic and PDVSA do not take a position on the ultimate relief requested in that motion and therefore they are not seeking to participate in the briefing on the motion or its timing. However, to avoid any negative inference from silence, the Republic and PDVSA wish to clarify that their silence does not imply agreement with statements offered by the Special Master or any party in support of, or in opposition to, the Motion for Injunction.

Respectfully submitted,

/s/ Christopher Fitzpatrick Cannataro

Christopher Fitzpatrick Cannataro (# 6621)
Counsel for the Republic

Respectfully submitted,

/s/ Samuel T. Hirzel, II

Samuel T. Hirzel, II (#4415)
Counsel for Petróleos de Venezuela, S.A.

STH/cmw

cc: All Counsel of Record (via e-filing)